

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:

BK RACING, LLC,

Debtor.

Chapter 11

Case No. 18-30241

APPLICATION FOR ADMISSION TO PRACTICE PRO HAC VICE

I, Caitlin A. Counts, am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Local Rule 2090-2 and Local Rule for Procedure and Practice 83.1 of the United States District Court for the Western District of North Carolina, I am moving for the *pro hac vice* admission of:

Full Name: Jonathan T. Edwards

Business Address: One Atlantic Center, 1201 West Peachtree Street, Suite 4900

City: Atlanta State: Georgia Zip: 30309

Office Telephone: (404) 881-4985

Email Address: jonathan.edwards@alston.com

This attorney will be representing:

The National Association for Stock Car Auto Racing, Inc. and NASCAR Event Management

We certify that:

- The proposed admittee is not a member of the North Carolina bar and does not maintain any law office in North Carolina.
- The proposed admittee has never had a *pro hac vice* admission or admission in any other bar revoked.
- The proposed admittee is a member of good standing of the bar of Georgia (admitted in 2008) and the bar of New York (admitted in 2016). He is also authorized to practice before the United States District Court for the Middle and Northern Districts of Georgia.
- The proposed admittee is in good standing in all jurisdictions in which he is admitted.
- The proposed admittee has not been disciplined by any court or administrative body, and does not have any pending disciplinary proceedings.
- The proposed admittee understands *pro hac vice* admission is for this case only and does not constitute formal admission to the bar of this Court.
- The proposed admittee has already established a CM/ECF account with the United States Bankruptcy Court for the Western District of North Carolina in accordance with Local Rule 2090-2(d).
- The undersigned movant will serve as co-counsel in these proceedings.
- The proposed admittee hereby requests authority to participate in hearings without the undersigned movant being in attendance.
- The \$281.00 fee for admission *pro hac vice* is being submitted with the filing of this motion.

Respectfully submitted this the 16th day of February, 2018.

ALSTON & BIRD LLP

/s/ Caitlin A. Counts

Caitlin A. Counts

N.C. State Bar No.: 50639

101 S. Tryon Street, #4000

Charlotte, NC 28280

Telephone: (704) 444-1173

Facsimile: (704) 444-1111

Email: caitlin.counts@alston.com

Counsel for NASCAR and NEM

CERTIFICATE OF SERVICE

The undersigned certifies that on February 16, 2018, the foregoing **APPLICATION FOR ADMISSION TO PRACTICE PRO HAC VICE** was filed using the Court's ECF system and that a copy of the same was furnished to all ECF Participants via Notice of Electronic Filing.

I further certify that on the same date, February 16, 2018, a copy of the foregoing **APPLICATION FOR ADMISSION TO PRACTICE PRO HAC VICE** was sent via First Class Mail to the following:

BK Racing, LLC
Attn: James H. Henderson, P.C.
1201 Harding Place
Charlotte, NC 28204-2248

U.S. Bankruptcy Administrator Office
402 West Trade Street, Suite 200
Charlotte, NC 28202-1669

/s/ Caitlin A. Counts

Caitlin A. Counts
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Counsel for NASCAR and NEM